

U.S. Department of Justice

Washington, DC 20530

**Registration Statement****Pursuant to the Foreign Agents Registration Act of  
1938, as amended****I-REGISTRANT****1. Name of Registrant**

Capitol Counsel LLC

**2. Registration No. (To Be Assigned By the FARA Registration Unit)**

6328

**3. Principal Business Address**700 13th Street, NW, Suite 200  
Washington, DC 20005**4. If the registrant is an individual, furnish the following information:**

(a) Residence address(es)

(b) Other business address(es), if any

(c) Nationality

(d) Year of birth

(e) Present citizenship

(f) If present citizenship not acquired by birth, state when, where and how acquired

(g) Occupation

**5. If the registrant is not an individual, furnish the following information:**(a) Type of organization: Committee ☐ Association ☐ Partnership ☐ Voluntary group ☐  
Corporation ☐ Other (specify) Limited Liability Company

(b) Date and place of organization 11/28/2006; Washington, DC

(c) Address of principal office 700 13th Street, NW, Suite 200  
Washington, DC 20005

(d) Name of person in charge John D. Raffaelli

(e) Locations of branch or local offices Washington, DC

(f) If a membership organization, give number of members See 5(g)

(g) List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.

| Name                           | Residence Address(es) | Position | Nationality |
|--------------------------------|-----------------------|----------|-------------|
| Please see full list attached. |                       |          |             |

(h) Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Jim McCrery

(i) Describe the nature of the registrant's regular business or activity.

Government Affairs Firm.

(j) Give a complete statement of the ownership and control of the registrant.

Capitol Counsel is owned by its six shareholders: Jim McCrery; John D. Raffaelli; Denise Henry Morrissey; Shannon Finley; David Jones; and Richard Sullivan.

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6. List all employees who render services to the registrant directly in furtherance of the interests of any of the foreign principals in other than a clerical, secretarial, or in a related or similar capacity.

| Name         | Residence Address(es)                                | Nature of Services              |
|--------------|--|---------------------------------|
| Jim McCrery  | 9018 Wisterian<br>Shreveport, LA 71106               | Government Relations Consulting |
|              | 2700 Clarendon Blvd., #E-316, Arlington,<br>VA 22201 |                                 |
| Dena Battle  | 1000 Dartmouth Road<br>Alexandria, VA 22314          | Government Relations Consulting |
| Warren Tryon | 216 9th Street, SE<br>Washington, DC 20003           | Government Relations Consulting |
| Allegra Han  | 3847 Ferrara Drive<br>Silver Spring, MD 20106        | Government Relations Consulting |

**II--FOREIGN PRINCIPAL**

7. List every foreign principal<sup>1</sup> for whom the registrant is acting or has agreed to act.

Foreign Principal

Republic of Turkey

(through Gephardt Group Government Affairs LLC)

Principal Address(es)

Embassy of the Republic of Turkey

2525 Massachusetts Avenue, NW

Washington, DC 20008

**III--ACTIVITIES**

8. In addition to the activities described in any Exhibit B to this statement, will you engage or are you engaging now in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

**IV--FINANCIAL INFORMATION****9. (a) RECEIPTS-MONIES**

During the period beginning 60 days prior to the date of your obligation to register<sup>2</sup> to the time of filing this statement, did you receive from any foreign principal named in Item 7 any contribution, income, or money either as compensation or for disbursement or otherwise? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.<sup>3</sup>

| Foreign Principal | Date Received | Purpose | Amount |
|-------------------|---------------|---------|--------|
|-------------------|---------------|---------|--------|

Total

<sup>1</sup> The term "foreign principal," as defined in Section 1(b) of the Act, includes a foreign government, foreign political party, foreign organization, foreign individual and, for the purpose of registration, an organization or an individual any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual.

<sup>2</sup> An agent must register within ten days of becoming an agent, and before acting as such.

<sup>3</sup> A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. There is no printed form for this exhibit. (See Rule 201(e), 28 C.F.R. § 5.201(e)).

**(b) RECEIPTS-THINGS OF VALUE**

During the period beginning 60 days prior to the date of your obligation to register<sup>4</sup> to the time of filing this statement, did you receive from any foreign principal named in Item 7 anything of value<sup>5</sup> other than money, either as compensation, or for disbursement, or otherwise? Yes ☐ No ☒

If yes, furnish the following information:

| Foreign Principal | Date Received | Thing of Value | Purpose |
|-------------------|---------------|----------------|---------|
|-------------------|---------------|----------------|---------|

**10. (a) DISBURSEMENT-MONIES**

During the period beginning 60 days prior to the date of your obligation to register<sup>6</sup> to the time of filing this statement, did you spend or disburse any money in furtherance of or in connection with your activities on behalf of any foreign principal named in Item 7? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each such foreign principal named including monies transmitted, if any, to each foreign principal.

| Date | To Whom | Purpose | Amount |
|------|---------|---------|--------|
|------|---------|---------|--------|

**(b) DISBURSEMENTS-THINGS OF VALUE**

During the period beginning 60 days prior to the date of your obligation to register<sup>7</sup> to the time of filing this statement, did you dispose of any thing of value<sup>8</sup> other than money in furtherance of or in connection with your activities on behalf of any foreign principal named in Item 7? Yes ☐ No ☒

If yes, furnish the following information:

| Date | Recipient | Foreign Principal | Thing of Value | Purpose |
|------|-----------|-------------------|----------------|---------|
|------|-----------|-------------------|----------------|---------|

**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During the period beginning 60 days prior to the date of your obligation to register<sup>9</sup> to the time of filing this statement, did you, the registrant, or any short form registrant, make any contribution of money or other thing of value from your own funds and on your own behalf in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office? Yes ☒ No ☐

If yes, furnish the following information:

| Date | Amount or Thing of Value | Political Organization or Candidate | Location of Event |
|------|--------------------------|-------------------------------------|-------------------|
|------|--------------------------|-------------------------------------|-------------------|

Please see full list attached.

4, 6, 7 and 9 See Footnote 2, on page 3.

5 and 8 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks", and the like.

**V--INFORMATIONAL MATERIALS<sup>10</sup>**

11. Will the activities of the registrant on behalf of any foreign principal include the preparation or dissemination of informational materials? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

12. Identify each such foreign principal.

13. Has a budget been established or specified sum of money allocated to finance your activities in preparing or disseminating informational materials? Yes ☐ No ☐

If yes, identify each such foreign principal, specify amount and for what period of time.

14. Will any public relations firms or publicity agents participate in the preparation or dissemination of such informational materials? Yes ☐ No ☐

If yes, furnish the names and addresses of such persons or firms.

15. Activities in preparing or disseminating informational materials will include the use of the following:

- ☐ Radio or TV broadcasts      ☐ Magazine or newspaper      ☐ Motion picture films      ☐ Letters or telegrams  
☐ Advertising campaigns      ☐ Press releases      ☐ Pamphlets or other publications      ☐ Lectures or speeches  
☐ Other (specify) \_\_\_\_\_

**Electronic Communications**

- ☐ Email  
☐ Website URL(s): \_\_\_\_\_  
☐ Social media website URL(s): \_\_\_\_\_  
☐ Other (specify) \_\_\_\_\_

16. Informational materials will be disseminated among the following groups:

- ☐ Public officials      ☐ Civic groups or associations  
☐ Legislators      ☐ Libraries  
☐ Government agencies      ☐ Educational groups  
☐ Newspapers      ☐ Nationality groups  
☐ Editors      ☐ Other (specify) \_\_\_\_\_

17. Indicate language to be used in the informational materials:

- ☐ English      ☐ Other (specify) \_\_\_\_\_

<sup>10</sup> The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

**VI--EXHIBITS AND ATTACHMENTS**

18. (a) The following described exhibits shall be filed with an initial registration statement:

- Exhibit A-* This exhibit, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal named in Item 7.
- Exhibit B-* This exhibit, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.
- (b) An Exhibit C shall be filed when applicable. This exhibit, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530. (See Rule 201(c) and (d)).
- (c) An Exhibit D shall be filed when applicable. This exhibit, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal. (See Rule 201 (e)).

**VII--EXECUTION**

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Print or type name under each signature or provide electronic signature<sup>11</sup>)

November 18, 2015

/s/ Jim McCrery, Partner

eSigned

<sup>11</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

**REGISTRATION STATEMENT ATTACHMENT 1**

**5(g) List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.**

| <b>Name</b>            | <b>Residence Address(es)</b>   | <b>Position</b> | <b>Nationality</b> |
|------------------------|--|-----------------|--------------------|
| John D. Raffaelli      | 503 High Street<br>Alexandria, VA 22302  | Member          | USA                |
| Shannon Finley         | 2640 44 <sup>th</sup> St. NW<br>Washington, DC 20007   | Member          | USA                |
| Denise Henry Morrissey | 7400 Park Terrace Drive<br>Alexandria, VA 22307  | Member          | USA                |
| Jim McCrery            | 9018 Wisterian<br>Shreveport, LA 71106<br><br>2700 Clarendon Blvd., #E-316,<br>Arlington, VA 22201 | Member          | USA                |
| Richard Sullivan       | 2709 Fairview Road<br>Raleigh, NC 27608  | Member          | USA                |
| David Jones            | 301 Tingey St., SE<br>Washington, DC 20003   | Member          | USA                |

**REGISTRATION STATEMENT ATTACHMENT 2****10(c) Disbursements-Political Contributions**

During the period beginning 60 days prior to the date of your obligation to register to the time of filing this statement, did you, the registrant, or any short form registrant, make any contribution of money or other thing of value from your own funds and on your own behalf in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office?

| Date       | Amount or Thing of Value  | Political Organization or Candidate                 | Location of Event |
|------------|---------------------------|---|-------------------|
| 9/14/2015  | \$500.00 (Warren Tryon)   | Lucas, Frank D. Via Lucas For Congress              | Washington, DC    |
| 9/23/2015  | \$500.00 (Warren Tryon)   | Cassidy, William M Via Bill Cassidy For Us Senate   | Washington, DC    |
| 9/23/2015  | \$500.00 (Warren Tryon)   | Emmer, Thomas Earl Jr. Via Emmer For Congress       | Washington, DC    |
| 9/23/2015  | \$500.00 (Warren Tryon)   | Hill, James French Via French Hill For Arkansas     | Washington, DC    |
| 9/25/2015  | \$2,500.00 (Warren Tryon) | NRCC  | Washington, DC    |
| 9/25/2015  | \$500.00 (Warren Tryon)   | Blunt, Roy Via Friends Of Roy Blunt                 | Washington, DC    |
| 9/29/2015  | \$500.00 (Warren Tryon)   | Daines, Steven Via Steve Daines For Montana         | Washington, DC    |
| 9/30/2015  | \$500.00 (Warren Tryon)   | Heck, Joe Via Friends Of Joe Heck                   | Washington, DC    |
| 9/30/2015  | \$500.00 (Warren Tryon)   | Luetkemeyer, W Blaine Via Blaine For Congress       | Washington, DC    |
| 9/30/2015  | \$250.00 (Warren Tryon)   | Dold, Robert James Jr Via Dold For Congress         | Washington, DC    |
| 9/30/2015  | \$500.00 (Warren Tryon)   | Cramer, Kevin Mr. Via Cramer For Congress           | Washington, DC    |
| 11/17/2015 | \$1,000.00 (Warren Tryon) | Rubio, Marco via Marco Rubio for President          | Washington, DC    |
|            |                           |   |                   |
| 9/21/2015  | \$2,600.00 (Jim McCrery)  | Buchanan, Vern via Vern Buchanan for Congress       | N/A               |
| 11/4/2015  | \$2,700.00 (Jim McCrery)  | Boustany, Charles via Charles Boustany for Congress | N/A               |